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Reply to: Matawan Office

VIA ECF FILING

April 9, 2018

Hon. Brian R. Martinotti, U.S.D.J.
United States District Court for the
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: Rogers, et al. v. Grewal, et al.
Civil Case No.: 3:18-cv-01544-BRM-DEA
Motion Returnable: May 7, 2018

Dear Judge Martinotti:

Please be advised this office represents Defendant Kenneth J. Brown, Jr. in the above-matter. On today's date, Chief Brown filed a Motion to Dismiss Plaintiffs' Complaint. On April 3, 2018, Defendants Gurbir S. Grewal, Patrick J. Callahan, Joseph W. Oxley and N. Peter Conforti (collectively referred to as the "State Defendants") filed a Motion to Dismiss. (Document No. 16). Please be advised that Chief Brown shall rely upon the Brief filed by the State Defendants in

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support of their Motion to Dismiss (Document No. 16-3), as a dismissal of Plaintiffs' Complaint as to Chief Brown is warranted for the same reasons as the State Defendants. In that regard, it bears noting that the only allegation within the Complaint as to Chief Brown is that he properly denied Plaintiff Thomas R. Rogers's application for a Handgun Carry Permit for failure to show a "justifiable need," as New Jersey law mandates.

Respectfully submitted,
CLEARY GIACOBBE ALFIERI JACOBS, LLC

By: /s/ Paul L. LaSalle
PAUL L. LASALLE